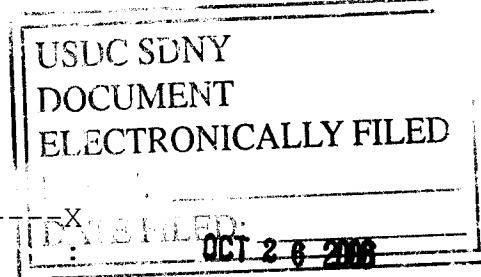


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

-v-

INDICTMENT

06 Cr.

ANGELA HUANG,  
a/k/a "Angela Hung,"  
a/k/a "Angela Lu,"  
ZHI JUN HUANG,  
BOUHARI ADOYI,  
FUYIN HUANG,

Defendants.

06 CRIM. 1006

COUNT ONE

The Grand Jury charges:

1. From on or about May 17, 2006, up to and including on or about July 26, 2006, in the Southern District of New York and elsewhere, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, BOUHARI ADOYI, and FUYIN HUANG, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other, to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 2320.

2. It was a part and an object of the conspiracy that ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, BOUHARI ADOYI, and FUYIN HUANG, the defendants, and others known and unknown, unlawfully, willfully, and knowingly would and

JUDGE KARAS

did traffic and attempt to traffic in goods and services and use a counterfeit mark on and in connection with such goods and services, in violation of Title 18, United States Code, Section 2320.

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, BOUHARI ADOYI, and FUYIN HUANG, the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

- a. On or about June 7, 2006, ANGELA HUANG directed an undercover Secret Service agent to the corner of 29<sup>th</sup> Street and 7<sup>th</sup> Avenue to pick up a bag filled with counterfeit handbags.
- b. On or about May 17, 2006, ZHI JUN HUANG accepted payment from an undercover Secret Service agent for thirty-six counterfeit handbags.
- c. On or about May 17, 2006, ADOYI provided an undercover Secret Service agent with a black garbage bag filled with thirty-six counterfeit handbags.
- d. On or about July 26, 2006, FUYIN HUANG told an undercover agent with the United States Secret

Service that a purchase of 1,020 counterfeit handbags would cost \$15,000.

(Title 18, United States Code, Section 371.)

**FORFEITURE ALLEGATION**

4. As a result of conspiring to commit the counterfeit goods offenses, as alleged in Count One of this Indictment, in violation of Title 18, United States Code, Sections 371 and 2320, ANGELA HUANG, a/k/a "Angela Hung," a/k/a "Angela Lu," ZHI JUN HUANG, BOUHARI ADOYI, and FUYIN HUANG, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense.

**Substitute Asset Provision**

5. If any of the forfeitable property described in paragraph 4, above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value;  
or

e. has been commingled with other property which  
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18,  
United States Code, Section 982(b), to seek forfeiture of any  
other property of said defendants up to the value of the above  
forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(c), 371,  
Title 21, United States Code, Section 853(p), and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ANGELA HUANG,  
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FUYIN HUANG,

Defendants.

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INDICTMENT

06 Cr.

(18 U.S.C. § 371)

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MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

*Michael J. Garcia*  
Foreperson.

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*Oct 26, 2006*  
*Indictment filed*  
*Case assigned to Judge Karas.*  
*Freeman, USA*